

Exhibit 4

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

NATIONAL ASSOCIATION OF
SCHOLARS,

Plaintiff,

v.

UNITED STATES DEPARTMENT OF
ENERGY, JENNIFER GRANHOLM, in her
official capacity as Secretary of Energy, and
GERALDINE RICHMOND, in her official
capacity as Under Secretary for Science and
Innovation,

Defendants.

Case No. 25-cv-00077

DECLARATION OF NAS MEMBER B

I, [REDACTED], declare as follows:

1. I have personal knowledge of the facts set forth in this declaration and, if called as a witness, could and would competently testify the same.

2. I have been a member of the National Association of Scholars (“NAS”) for approximately 20 years and believe in the mission and goals promoted by NAS.

3. I am a professor of engineering at a well-known Tier 1 research university and a have been a faculty member there for over 25 years.

4. Over the past 27 years I have applied for and received grants for scientific research from various federal agencies including the Department of Energy, the National Institutes of Health, and the National Science Foundation.

5. In my career I have received research funding from federal agencies for at least 6 research projects.

6. Much of my research funding has come from private sources, but in the past 5 years, I have received multiple grants from federal agencies, and I am interested in pursuing additional research funding from federal agencies for certain research projects that I believe are a good fit for federal research grant funding.

7. Specifically, I am interested in getting funded to perform research on a topic related to research I did several years ago that was funded by a grant from the Department of Energy. Although in the preliminary stages, this is a project that I think could merit funding from the Department of Energy.

8. I will not seek funding from the Department of Energy because I refuse to submit a Diversity, Equity and Inclusion (“DEI”) statement, and I believe the Department’s Office of Science Promoting Inclusive and Equitable Research (“PIER”) plan requirement is a DEI statement.

9. I do not think that DEI statements should be needed, nor do I think that DEI should be promoted in higher education because it politicizes science, is contrary to individual merit and achievement, and is also contrary to equality of opportunity, which I fully support.

10. I think that the promotion of DEI goals and principles frequently undermines the pursuit of scientific and academic excellence.

11. I fully support the efforts of NAS to investigate and report on DEI within higher education and especially within the Science, Technology, Engineering and Math (“STEM”) disciplines.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on January 2, 2025, in [REDACTED].

[REDACTED]

[REDACTED] (Member B)